



CALIFORNIA CORRECTIONAL HEALTH CARE SERVICES

VOLUME 6: HEALTH INFORMATION MANAGEMENT	Effective Date: 01/2002
CHAPTER 2	Revision Date: 08/2016
6.2.2 SECURITY AND PRIVACY PROCEDURE	Attachments: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

I. PROCEDURE OVERVIEW

California Correctional Health Care Services (CCHCS) Health Information Management (HIM) shall ensure all employees are informed of and follow established rules, guidelines, and statutes that protect patient privacy, security, access to, use, and disclosure of Protected Health Information (PHI). As new technologies evolve with the use of computerized patient health records, HIM staff shall implement and reinforce procedures for authorizing access to PHI.

II. RESPONSIBILITY

Under the direction of the Deputy Director, Medical Services, HIM Headquarters, Institution Health Records, and Health Record Center staff are responsible for the oversight, implementation, monitoring and evaluation of this procedure.

III. DEFINITIONS

Protected Health Information: Information created or received by CCHCS which identifies or can be used to identify an individual as it relates to past, present, or future health conditions; health care services provided to the individual; or health care related payments. This applies to information that is transmitted or maintained in verbal, paper, or electronic form.

IV. PROCEDURE

A. PHI Identifiers

Any of the following personal data identifiers, used in combination with a medical condition, becomes PHI and shall not be disclosed without proper authorization or approval.

1. Last name, first name, middle name or initial.
2. Current location of the patient, to include physical address (street name, city, county, and zip code).
3. Dates (other than a year) directly related to an individual, such as date of birth, admission date, discharge date, and date of death.
4. Medical record numbers (California Department of Corrections and Rehabilitation (CDCR) number).
5. Full face photographic images and any comparable images.

B. Accountability

1. All CCHCS/CDCR health care employees shall ensure PHI is covered or unable to be viewed at all times when information is not in use.
2. All computerized systems shall be protected with a unique user ID and a complex password.

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C. Backup and Storage of PHI

1. All CCHCS/CDCR health care employees shall ensure that any tampering of PHI is identified and reported to the Information Security Officer.
2. HIM, Health Records, and Information Technology Units shall ensure:
 - a. The use of appropriate technical safeguards, as stated in 45 Code of Federal Regulations Part 164, Subpart C, to restrict access to, protect the integrity of, and guard against the unauthorized access to electronic PHI.
 - b. Any tampering of PHI is identified and reported, as appropriate.
 - c. Availability of health information is readily accessible to the extent possible.
 - d. Capability of storing information pursuant to retention requirements.
 - e. Availability of backup and restore operation.
 - f. Management review of security periodically for necessary changes as a result of technology evolution.
 - g. Periodic risk assessments conducted by management in accordance with State Administrative Manual, Section 5305.6, Risk Management, to ascertain the threats and vulnerabilities that impact CCHCS and HIM assets, and implement appropriate mitigations.

IV. REFERENCES

- Code of Federal Regulations, Title 45, Part 164, Subpart C
- Health Insurance Portability and Accountability Act, Summary of HIPAA Privacy Rules
- Health Insurance Portability and Accountability Act, Summary of HIPAA Security Rules
- Health Insurance Portability and Accountability Act, Protected Health Information
- California Civil Code, Sections 56-56.37, Medical Information Confidentiality
- California Health and Safety Code, Sections 1275-1289.5, Health Facilities Data Breach
- State Administrative Manual, Section 5305.6, Risk Management
- Clark M., Gregg C., Hughes G., Lessig R., Morris D., & Wieland L. (2001) Documentation for ambulatory care (Revised ed.). American Health Information Management Association. Chicago, IL
- California Correctional Health Care Services, Inmate Medical Services Policies and Procedures, Volume 13, Privacy